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# **South Coast Air Quality Management District**

# Engineering & Compliance

Policies & Procedures

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

## MEMORANDUM

**DATE:** March 15, 1991

**TO:** Engineering Managers and Supervisors

**FROM:** Mohsen Nazemi /s/ MN **SUBJECT:** Rule Implementation Plans

As part of an effort to facilitate rule implementation and interpretation, the Engineering Division will be preparing rule implementation plans (RIP) for all newly adopted or amended rules. These plans are to be prepared prior to the Board meeting during which the rule will be adopted or amended. It is desirable to have these RIPs prepared and ready according to the following schedule:

Submitted for supervisory review 3 weeks prior to adoption Submitted for managerial review 2 weeks prior to adoption Submitted for Director's review 1 week prior to adoption

Ultimately the RIPs should be prepared and ready at the time a new or amended rule is set for hearing, which is generally a month before the hearing date.

Attached is an outline and a generic RIP format which demonstrates the extent of the material that should be included in each implementation plan and provides an example for your use. In RIP preparations it is recommended to concentrate more on the interpretation of terminologies related to applicability, requirements and exemptions and on the implementation procedures.

In the future, it will be desirable to prepare a single RIP for the office of operations which includes Engineering, Enforcement and Applied Science and Technology (AST) Divisions' specific requirements and implementation plans. Also attached for your information is a rule forecast report which provides you with information related to the upcoming rules so you can be prepared in advance.

Please let me know if you have any pleasions or comments related to the RIP format. Thank you.

MN:caz

(ruleimp2)

Attachments

cc: E. Camarena

B. Fray N. Nikkila

#### **ENGINEERING DIVISION**

#### **RULE IMPLEMENTATION PLAN**

#### I. <u>INTRODUCTION</u>

- A. **SUMMARY:** Provide the title and a brief description of this rule. Include the current status, if any, of this rule. Describe the circumstances that require this rule.
- B. INTENT OF RULE: Give a complete and detailed description of the objective or purpose of this new or amended rule. Describe the desired product or anticipated results. What are the desired/expected emission reductions. What is the origin of this rule. State law, Air Quality Management Plan (AQMP) measure, and/or EPA'S State Implementation Plan (SIP).

C. 7	his	Rule	<b>Imp</b>	lementatio	on I	Plan	is:
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	An Initial Rule Implementation Plan Document
	A Supplement to a Previous Rule Implementation Document

## II. APPLICABILITY

- **A. TYPE OF EQUIPMENT:** *List the types of equipment affected by the Rule.*
- **B. TYPE OF INDUSTRY:** List the types of industry affected by the Rule.
- **C. OTHER:** *List any other sources or equipment that the Rule would also apply to.*

#### III. KEY RULE COMPONENTS, INTERPRETATIONS, AND IMPLEMENTATION

**A. CONTROL REQUIREMENTS, LIMITS, AND COMPLIANCE DEADLINES:** Provide the requirements and limits of this rule. Describe the potential control technologies, requirements, and corresponding efficiencies If applicable, include any compliance schedule/deadlines. Perhaps, establish relationship between the control requirements and the goals and objectives of this rule stated in I(B).

The compliance requirements and schedule could either be presented in a Table or a Flow Chart. Please see example on Page 2 for a Table and the example on Page 4 for a Flow Chart.

#### EXAMPLE:

Rule 1134 - Emissions of Oxides of Nitrogen From Stationary Gas Turbines

EQUIPMENT: Stationary Gas Turbine

#### EMISISONS LIMITATIONS AND COMPLIANCE SCHEDULE:

Unit Size, Rating	NOX LIMITS,	COMPLIANCE PLANS	FINAL COMPLIANCE
Megawatt (MW)	(PPM)	SUBMITTAL DATE	<u>DEADLINE DATE</u>
$0.3 \ to < 2.9 \ MW$	25	December 31, 1993	December 31, 1995
$2.9 \ to < 10 \ MW$	9	December 31, 1993	December 31, 1995
$2.9 \ to < 10.0 \ MW$ ,	15	December 31, 1993	December 31, 1995
no SCR			
$\geq 10.0  MW$	9	August 1, 1993	December 31, 1995
≥ 10.0 MW, No SCR	12	December 31, 1 <mark>992</mark>	December 31, 1995
≥60 MW, Combined	15	December 31, 1992	December 31, 1995
Cycle, No SCR			
≥60 MW, Combined	9	December 1, 1992	December 31, 1995
Cycle		(7	

- **B. EXEMPTIONS:** Provide any exemptions from the specific requirements of this rule. State why they are exempt, i.e. cost-effectiveness findings, non-technologically feasible, negligible emissions.
- C. RECORDKEEPING/MONITORING: State if any records shall be maintained pursuant to Rule 109 or in any other fashion. State if any emissions monitoring is required: installing, operating, and maintaining a calibrated compluous monitoring system approved by Executive Officer to demonstrate compliance with the emission limits of the rule; maintaining a data gathering system with retrieval capability as approved by the Executive Officer; providing source test information; and/or maintaining a daily operating log for a particular amount of time and making it available for inspection.
- **D. COMPLIANCE PLANS:** Provide any requirements for submission of an Emmision Control Plan of all actions and alternatives, including a schedule of increments of progress, which will be taken to meet the requirements of the applicable emissions limitations and compliance schedules.
- **E. OTHER:** Provide any other requirements of this rule not already mentioned.

## IV. <u>INTERNAL/EXTERNAL TRAINING</u>

**A. UNIT ASSIGNMENT** *State or list which units will be affected by this rule.* 

EXAMPLE:

<u>EQUIPMENT</u> <u>UNIT</u>

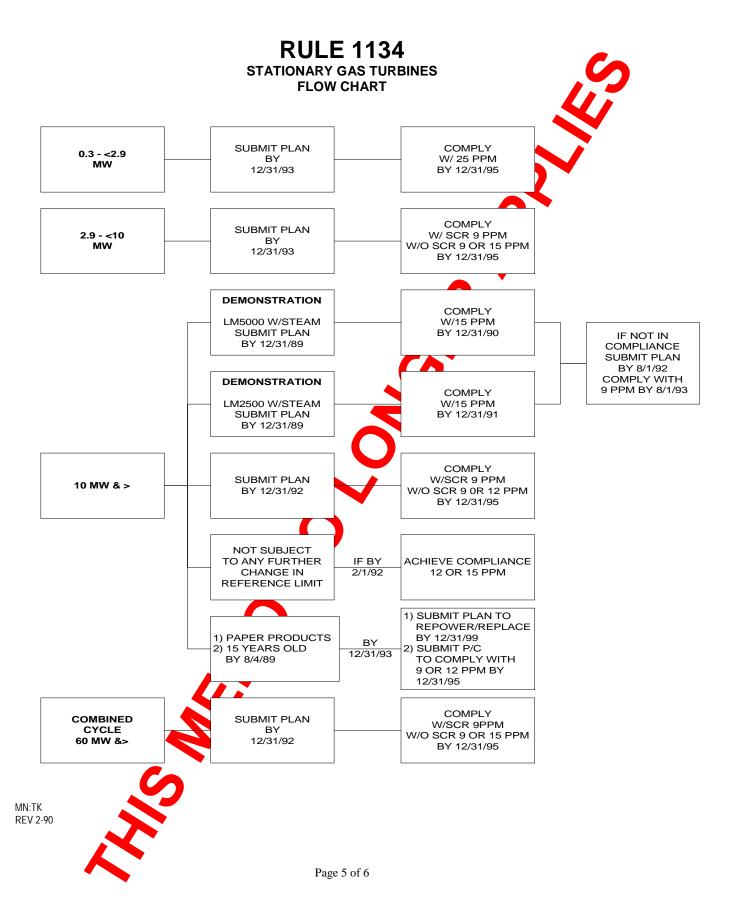
Stationary Gas Turbines Resource Recover

Combustion Rule 219 Landfill

- **B. STANDARDIZED PROCESSING** State if any standardized processing will be used to process the application affected by this rule. Provide a description or attach an example of this standardized processing.
- C. COMPUTER ASSISTED PERMIT PROCESSING SYSTEM (CAPPS): State if CAPPS will be utilized to process the application affected by this rule If so, note which CAPPS modules will be affected by this rule and specifically what modifications are needed
- **D. PROCESSING FLOW CHART (DECISION TREE)** Attach a processing flow chart if necessary to assist in the permit processing of an application affected by this rule.

#### V. COORDINATION NEEDED TO IMPLEMENT RULE:

- **A. INTRADIVISIONAL** Provide descript on of changes or activities that must occur within the Engineering Division in order to property implement this rule. Examples include: modifications or development of Divisional policies, modification or development to the Best Available Control Technology (BACT) Guidelines.
- **B. INTERDIVISIONAL:** Frovide description of changes or activities that must occur within the District Divisions in order to implement this rule. Examples include: CEM certification by TSD; risk assessment reviews by Planning; field verification by Enforcement prior to permitting or as a compliance monitoring requirement; development or modifications of new tracking systems or databases by ISD; Reclassification of personnel by Personnel.



#### VI. RESOURCE REQUIREMENTS

- **A. RESOURCES:** State how many FTEs are required to implement the rule in the Engineering Division by performing the following: Permit processing, Plan and Protocol review, Toxic emission evaluation based on the results of risk assessment, Rule compliance determination based on the results of source testing, etc. Provide an assessment of in-house skills and capabilities, relative to the requirements of the rule, to justify the need for additional staff, if applicable.
- **B. EQUIPMENT:** State which type of equipment would be required by staff due to the implementation of this rule: Telephones, Computers, Workstations, Analyzers, Vehicles, Chart Recorders, etc.
- C. DATA TRACKING: A new Resource Tracking Data Base is needed to keep track of additional resources required to implement this rule. The database should keep track of cumulative resource requirements in the Engineering Division for implementation of newly adopted or amended Rules.

## VII. <u>CONCLUSIONS</u>

- A. ISSUES REMAINING TO BE RESOLVED: State any issues not mentioned above and need to be addressed.
- **B. RECOMMENDED METHOD TO RESOLVE ISSUES STATES IN VII(A):** Provide any methods or suggestions to resolve the issues stated in VII(A).

